

Illicit Discharge Detection & Elimination

Introduction:

The Illicit Discharge Detection and Elimination Program is required under S5 (B)(3) of the Eastern Washington Phase II Municipal Stormwater permit. An illicit discharge is defined as any discharge to the storm sewer system that is not composed entirely of stormwater. Illicit discharges may come from an illegal connection to the storm sewer, spills or intentional dumping of wastewater or pollutants into a storm drain.

Objective:

The primary objective is to comply with the federal and state stormwater regulations. For this specific program, the goal is to eliminate illicit discharges to surface water and groundwater through the detection of illicit discharges, stormwater education and enforcement of the local stormwater regulations.

Performance Measures (IDDE Program Elements):

I. Storm Inventory & Maps

Each jurisdiction will develop a map of the storm sewer system in an electronic format with fully described mapping standards including the following elements:

- i. Location of all known and new connections to the system authorized and approved by the local jurisdiction
- ii. All known outfalls
- iii. Names and locations of all waters of the state that receive stormwater discharges
- iv. Areas served by discharges to ground

Stormwater maps will be updated at least annually to include new subdivisions and stormwater facilities. Each jurisdiction will have a procedure for maintaining documentation of information included on the map.

Timeline:

- *1/3 of the mapping complete by February 2010*
- *2/3 of the mapping complete by February 2011*
- *Mapping completed no later than February 2012*

II. Local Regulation

Each local jurisdiction must adopt an ordinance or resolution to prohibit illicit discharges and authorize enforcement action, including discharges occurring on private property. The Illicit Discharge Detection and Elimination Ordinances and Resolutions can be found in Appendix A.

Illicit Discharge Detection & Elimination

Based on the local ordinance or resolution an Enforcement Action Plan has been developed. The plan includes:

- i. An enforcement matrix/flowchart
 1. For illicit connections where hazardous materials are discharged, the connection must be terminated within 180 days.
- ii. Escalating enforcement actions
 1. Verbal/Written Warning
 2. Administrative Action
 3. Administrative Action with Fine and/or Cost Recovery
 4. Legal Action

The complete Enforcement Action Plan can be found in Appendix B.

Timeline:

- *Adopted an ordinance or resolution no later than August 2009*
- *Develop and implement an enforcement plan by August 2010*

III. Illicit Discharge Detection and Elimination (IDDE) Program

Illicit discharges will be detected through field assessments, the investigation of complaints, and from monitoring data. The local jurisdiction will respond on average within 7 days. The response may include an investigation by the responsible jurisdiction or a referral of the violation to another appropriate agency such as the local emergency response team or Department of Ecology. Illicit connections and discharges to the storm sewer system involving hazardous materials must be investigated no later than 21 days from the time of the initial report or discovery.

The local agencies will determine priority areas likely to have illicit discharges based on the following criteria:

- i. Land use and associated business/industrial activities that may cause illicit discharges
- ii. Past illicit discharge incidents and reports received
- iii. Areas with storage of large quantities of materials or hazardous substances that could result in spills and negative environmental impacts

A. Field Assessments

Field assessments will be conducted to evaluate outfalls and priority areas and identify previously unknown outfalls. These assessments should occur during dry weather to detect any potential illicit discharges and will be scheduled based on a prioritized list. Recordkeeping in the field will be done using either a field log book or an inspection report form. The jurisdiction may also use an electronic database to track inspection information. Reports will include information on suspected illicit discharges, the date, time, location, observations, test results and

Illicit Discharge Detection & Elimination

if a sample was collected for further analysis. Aerial photographs may also be useful for evaluation drainage basins and identifying potential sources of illicit discharges including industrial activities and swimming pools.

Field surveys will be conducted based on the list of priority areas and outfalls in Appendix C.

B. Illicit Discharge Response Plan

Procedures for characterizing illicit discharges and evaluating the appropriate action needed to protect public safety and the environment have been developed. Refer to Appendix D for the Illicit Discharge Response Plan.

C. Public Education

Target audiences for IDDE education will primarily fall into three main categories governmental agencies, commercial/industrial businesses and residential activities. As part of the Public Involvement, Education and Outreach plan, a list of commercial/industrial businesses and activities was developed.

- Restaurants
- Grocery Stores and Outlets
- Health Services
- Distributing and Freight Services
- Antique Shops
- Cleaning, Maintenance, Laundry & Restoration Services
- Lawn Care
- Electrical, Plumbing, Refrigeration & Heating Services
- Beauty Salons & Barber Shops
- Pool & Spa Dealers and Services
- Construction Services
- Transportation Services: Sales, Recreation, Rentals, Trucking, Gas Stations, Repair & Service, and Car Washes

Permit and business license information will be used to contact property owners with specific types of businesses and facilities.

Public education campaigns may be prioritized based on illicit discharge complaints, field assessments, monitoring data, types of operations and other criteria specific to a certain area or type of business. Public education materials will be developed and distributed by:

- i. Mail as part of utility bills, newsletters or targeted letters
- ii. Brochures will be available at public offices and at events such as home shows and public meetings
- iii. Presentations by staff to business groups and other organizations such as homeowner's associations
- iv. Work with local schools to provide materials and presentations

Illicit Discharge Detection & Elimination

- v. Provide information at the time of permit or business license application or issuance at city/county offices.

D. Program Evaluation

The program will be evaluated annually and a summary of the evaluation included in the annual report to DOE. The IDDE program will be assessed using information from illicit discharge/spill reports, inspections reports, and feedback from public education efforts.

E. Training

IDDE program training will be provided to all municipal staff including office and field staff on a regular basis.

- i. Stormwater utility and code enforcement staff will be trained on identification, investigation, termination, cleanup, and reporting of illicit discharges including spills, improper disposal, and illicit connections.
- ii. Office staff will be trained on procedures for documenting an incident or complaint.
- iii. Other municipal staff including but not limit road maintenance crews and building inspectors will be trained on identifying spills and illicit discharges and the proper procedures for reporting and documenting.
- iv. The local jurisdictions will also coordinate with the fire departments and DOE for emergency spill response of hazardous materials.

Timeline:

- *Publicize a hotline or other local number for public reporting of spills and other illicit discharges by February 2009.*
- *Field assessment prioritization completed by February 2010*
- *Field assessment for at least 3 high priority water bodies or areas completed by February 2011*
- *Program must be developed and implemented by September 2011*
- *Field assessment of a least one high priority water body or other high priority area each year starting from 2012 on.*

Resources:

1. Model Municipal Stormwater Program for Eastern Washington, Washington State Department of Ecology, Water Quality Program, Publication No. 03-10-076, September 2003
2. Illicit Discharge Detection and Elimination Manual: A Handbook for Municipalities, New England Interstate Water Pollution Control Commission, January 2003

Wenatchee Valley Stormwater Management Program

Illicit Discharge Detection & Elimination

3. Illicit Discharge Detection and Elimination: A Guidance Manual for Program Development and Technical Assessments, Center for Watershed Protection & Robert Pitt, University of Alabama, October 2004
4. Rouge River, Michigan Illicit Discharge Program
<http://www.wcdoe.org/rougeriver/techtop/illicit/index.htm>
5. LA County Model Illicit Discharge Program
<http://www.lapdw.org/wmd/NPDES/ICIDTC.cfm>
6. King County Model Illicit Discharge Program
<http://dnr.metrokc.gov/wlr/stormwater/NPDESCompliance.htm>

Appendix:

- Appendix A Illicit Discharge Detection & Elimination Ordinance
- Appendix B IDDE Enforcement Action Plan
- Appendix C List of Priority Areas and Outfalls
- Appendix D IDDE Response Plan
- Appendix E Recordkeeping Forms
 - A. Outfall Field Survey Report
 - B. Illicit Discharge Incident Report

(Note: Bold items in the timeline sections have been completed).